

REMARKS:

This Amendment is in response to a Final Office Action dated November 12, 1999.

Claims 1-13 are pending in the present application. Claims 1, 2, 7-13 have been amended and claims 14 and 15 have been added. Claims 1-15 are pending.

This response is submitted in accordance with Rule 116 in an earnest effort to put the application in better condition for allowance. It is believed that Applicant's response has not amended the claims in a way that would raise new issues for consideration or that would require further searching of the prior art on the part of the Examiner.

The Examiner objected to Figures 4-5, 7A-B, 8A-C, and 9A-B for requiring legends. Reference numbers 410 and 411 were removed from FIG. 4, as they were not referred to in the specification. Legends were added to Figures 4-5, 7A-B, 8A-C, and 9A-B. Amended drawings with changes in red are attached hereto.

Claims 1, 2, and 7-13 have been amended to recite a "hand-held" digital camera, and independent claims 1, 7, and 11 have been amended to recite that the "hand-held" digital camera includes an "integrated" display. Independent claim 1 has further been amended to explicitly recite that the camera prompts the user to perform a "first operation" and a "second operation, rather than "specific operations," thereby minimizing the number of key sequences the user must memorize in order to perform the operations." Support for the amendment can be found on page 16 of the Specification. Independent claim 7 has been amended to recite the step of "allowing the user to capture the image" after being prompted to do so. Independent claim 11 has been amended to recite that the processor further includes means for "waiting on the user to perform the specific camera operations before displaying additional interactive instructions." Support for

the amendments to claims 7 and 11 can be found on page 23 of the Specification.

New claim 14 has been added that is based on claim 1, which enumerates the steps for guiding a user through a series of related image captures. New claim 14 recites executing a directed image capture sequence such that a first interactive instruction is displayed on the integrated display prompting the user to capture an image; waiting for the user to capture the first image; in response to the user capturing the first image, displaying a second interactive instruction prompting the user to capture a second image; and storing the images as a related group of images. Support for claim 14 can be found on pages 23-24 of the Specification.

New claim 15, which is dependent on claim 14, further recites prompting the user to enter information regarding the first and second images, and storing the information with the related group of images. Support for claim 15 can be found on pages 19 of the Specification.

Accordingly, it is submitted that no new matter has been added.

The Examiner rejected claims 1-13 under 35 U.S.C. §103 as obvious over European Patent No. 661,658 A2 issued to Parulski in view of U.S. Pat. No. 5,198,851 issued to Ogawa. Applicant respectfully traverses the rejection.

The amended claims of the present invention are directed to a digital camera that is capable of guiding a user through specific operations, such as capturing a series of related image captures. The digital camera displays an interactive instruction prompting the user to perform a specific operation, waits on the user to perform that operation, and then displays another instruction prompting the user to perform the next operation.

As stated in the previous Amendment, neither Parulski or Ogawa teach a system in which scripts are stored and executed within a hand-held digital camera, as recited in the amended

claims. In contrast, Parulski teaches executing programs on a PC, and Ogawa teaches executing programs on a terminal device. The Examiner argues, "Ogawa's terminal device is part of Ogawa's camera, because it is connected by a cord." Applicant finds this to an unreasonable argument. Ogawa's terminal device is no more part of, or integral with, Ogawa's camera than a VCR is part of a television. In both instances, the functionality provided by the two tethered devices would cease once the connection is severed. The present invention has no such problems.

Parulski and Ogawa also fail to disclose a camera in which interactive instructions are displayed on an "integrated" display. Parulski's system requires a PC display, and Ogawa's terminal device houses the display, rather than the camera.

Ogawa is cited for teaching "interactive instructions." However, Ogawa teaches nothing about "prompting a user to perform a first operation," and in response to the user performing the first operation, prompting the user "to perform a second operation," as recited in amended claim 1. Similarly, Ogawa fails to teach the steps of prompting the user to capture a first image, waiting for the user to capture the first image; in response to the user capturing the first image, displaying a second interactive instruction prompting the user to capture a second image; and storing the images as a related group of images, as recited in independent claim 14.

In addition, the terminal device in Ogawa is used to set camera operational conditions, however, the information displayed on the terminal is not believed to be "interactive". That is, the terminal device displays static camera setting information or operational directions that the user may follow step-by-step, which is not interactive. In fact, one purpose of the present invention is to eliminate the display of such PC-type "help screens" (Specification, page 5).

Ogawa is further cited for storing scripts on the camera because Ogawa teaches "an IC card for storing information on the camera." This information, however, has to do with static camera settings, rather than scripts that are "executed on the hand-held digital camera."

With respect to claim limitations in claims 7, 3, 4 regarding "text-based" scripts, the Examiner stated that "text-based script programming languages, such as Java, are notoriously well-known in the art." Applicant does not disagree. But the Examiner must point to reference teaching or suggesting the use of scripts or Java scripts in a portable digital camera in order to maintain the rejection. It is well settled that "obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination." *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577 (Fed. Cir. 1984). Consequently, "it is impermissible to use the claimed invention as an instruction manual or 'template' to piece together the teachings of the prior art so that the claimed invention is rendered obvious...one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention." In re Fritch, 972 F.2d 1260, 23 USPQ.2d 1780 (Fed. Cir. 1992).

It is respectfully submitted that none of the cited references suggest (expressly or by implication) combining the teaching of the Parulski and Ogawa, with the general knowledge of scripting to produce the combination of features claimed in the present invention. Furthermore, it is submitted that such a combination would still fail to render the present invention obvious for the reasons set forth above.

In view of the foregoing, it is submitted that independent claims 1, 7, 11 and 14 are allowable over the cited references, and the dependent claims are allowable because they are

dependent upon the allowable independent claims. Accordingly, Applicant respectfully requests reconsideration and passage to issue of claims 1-15 as now presented.

Applicants' attorney believes that this Application is in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted,



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